

DECLARATION OF JOE NOVARA

I, JOE NOVARA, hereby declare under penalty of perjury the following is true and correct to the best of my information and belief:

1. I am the owner/operator of the Alley Galley Sandwich Shop located at Santa Barbara Harbor, County of Santa Barbara, State of California.

2. On or about June 24, 1984 while operating the above-described business, I was ~~approached by~~ ^{introduced to} a Mr. Al Bei who gave me a business card, a copy of which is attached to this Declaration as Exhibit "E."

3. Mr. Bei indicated to me he was involved in an investigation of a wide range of serious international criminal activity and mentioned the names of several individuals and groups, all of which I was at the time unaware of.

4. Mr. Bei then inquired if I knew the attorneys upstairs, indicating the law offices of Bright & Powell, which are located on the second floor of the Marine Center Building and are the only law offices in the harbor area.

5. I indicated that I did know all the lawyers of Bright and Powell personally and had so known them for several years.

6. Mr. Bei then informed me that the "lawyers," meaning Bright and Powell, were involved with the aforementioned criminals, as well as specific criminal activity. The clear meaning of Mr. Bei's remarks were to indicate that the lawyers practicing as Bright & Powell were themselves involved in criminal activity and were under an active investigation by Mr. Bei's agency, which was further implied to have a governmental sanction or to be acting in concert

268

253-

1 with governmental law enforcement agencies, the exact names of which
2 Mr. Bei did not specify.

3 7. I was told by Mr. Bei if I observed any suspicious
4 activity or conduct on behalf of the lawyers I could contact the
5 "task force" at the number indicated on Exhibit "E."

6 8. As I have known Messrs. Bright and Powell as well as their
7 associates, Mr. Dietsch and Ms. Johnson, all for many years, and in
8 fact have been represented by that firm in a civil matter, I felt
9 the information and impression left by Mr. Bei was erroneous and
10 therefore contacted Mr. Bright the following day on Monday, June 25,
11 1984.

12 9. After having explained the above to Mr. Bright, Mr. Bright
13 expressed concern as to whether any other clients of his firm had
14 been contacted by Mr. Bei. I indicated that Mr. Brewer of Argonaut
15 Sales had also been contacted and possibly others at which point Mr.
16 Bright displayed mild anger and requested my assistance in preparing
17 a formal court declaration concerning the matter.

18 10. If called to as a witness I could competently testify as
19 to the above.

20 Executed at Santa Barbara, California on June 29, 1984.

21
22
23 Joe Novara
24 JOE NOVARA
25
26
27
28